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**From:** Arcari, Christine [Arcari.Christine@epa.gov]  
**Sent:** 6/23/2017 12:38:43 PM  
**To:** Kohler, Amanda [Kohler.Amanda@epa.gov]  
**CC:** Guernica, Mimi [Guernica.Mimi@epa.gov]; Shuster, Kenneth [Shuster.Kenneth@epa.gov]; ORCR Press [ORCR\_Press@epa.gov]  
**Subject:** FW: ORCR/OECA press inquiry - RCRA enforcement database

**Importance:** High

Hi Amanda,

See press inquiry below. Is this something we can help with or is this more of an OECA thing?

Thanks,

Christine

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Christine Arcari  
U.S. Environmental Protection Agency  
Email: arcari.christine@epa.gov  
Phone: 703-308-8462

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**From:** StClair, Christie  
**Sent:** Friday, June 23, 2017 8:28 AM  
**To:** Miles, Erin <Miles.Erin@epa.gov>; Shiffman, Cari <Shiffman.Cari@epa.gov>; Cohen, Nancy <Cohen.Nancy@epa.gov>; ORCR Press <ORCR\_Press@epa.gov>  
**Cc:** Hull, George <Hull.George@epa.gov>; Ortiz, Julia <Ortiz.Julia@epa.gov>  
**Subject:** ORCR/OECA - RCRA enforcement database

All,

Abrahm Lustgarten from ProPublica is looking for a technical backgrounder today on the RCRA enforcement database. Is someone available?

He has written his story already and wants to fact check how he's used the data and how he's described it. Nothing for attribution/comment – just technical questions to make sure I am not misusing the data. He originally sent the request directly to Rebecca Kane but didn't hear back.

His request is below. If someone's available, please let me know their window of availability.

Thanks,  
Christie

**REQUEST:**

I've got a dataset for sites in the RCRA database with RCRA Subpart X permits to Open Burn and detonate hazardous explosives, and I'm examining violations for those specific RCRA IDs that correspond to the Subpart X permits. I'm trying to assess whether the violations I see are definitely associated with the Subpart X permits. So my questions are:

- can those IDs correspond to other violations other than Sub X permit violations or is each RCRA ID specific to the OBOD Sub X permit?
- BASICALLY: if I have a facility ID for an Open Burn/Open Detonation Subpart X permit, is that ID unique to that permit, or also used for other RCRA-specific enforcement issues? Ie – if I see a violation under that ID, do I know that it is a violation of its Sub X permit?
  - o For example, if I take Elmendorf/Richardson base in Alaska, RCRA ID: AK1210022157 and put into Echo, I see multiple RCRA IDs for that site, but the ID I am using matches TSDF for its handling and storage of haz materials.
  - o My violations data for that site and the TSDF permit shows 8 violations coded 264.A, which corresponds to a general Treatment, storage and Disposal violation.
  - o Can I understand that to be specific to their Subpart X permit under that same RCRA ID #? Or is it somehow more general?
- Separately, in the violation codes for RCRA, I see several codes which seem to correspond more specifically to handling of munitions and explosives, 264.EE for example. Is there a catalogue with more precise descriptions of these codes that I should use/reference? Would I only want to look for 264.EE violations if I'm interested in explosives and Subpart X, or could Subpart X permit violations fall under other TSD-related violation codes?

Sent from my iPhone